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February 20, 2024

Clerk of the Court
United States District Court, Northern District of California
450 Golden Gate Ave.
San Francisco, CA 94102

Re: Request to Issue Subpoena under 17 U.S.C. § 512(h) in Case No. 3:24-mc-80041

Dear Clerk of the United States District Court for the Northern District of California:

Pursuant to 17 U.S.C. § 512(h), Petitioner Christopher Boomer hereby requests that the Clerk of this Court issue the proposed subpoena attached to this request to Roblox Corporation (“Roblox”), owner of the site and digital gaming platform www.roblox.com, to identify alleged infringers of Mr. Boomer’s copyright protected work.

The following are attached, as required by 17 U.S.C. § 512(h)(2):

1. a copy of DMCA notifications to Roblox, including
 - a. a DMCA Request dated January 5, 2024 and Annex 3 to that letter, attached as **Exhibit 1**,
 - b. a DMCA Request dated January 24, 2024 and Annexes to that letter, attached as **Exhibit 2**,
2. a proposed subpoena, attached as **Exhibit 3**; and
3. a sworn declaration as to the purpose of the subpoena, located at the end of this request.

Mr. Boomer respectfully requests that the Clerk expeditiously issue and sign the proposed subpoena pursuant to 17 U.S.C. § 512(h)(4).

Sincerely,
Tyz Law Group PC

/s/ Sean K. Apple
Sean K. Apple

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DECLARATION PURSUANT TO 17 U.S.C. § 512(h)(2)(C)

I, Sean K. Apple, declare as follows:

1. I am an attorney licensed to practice in the State of California and the Northern District of California. I am an attorney at Tyz Law Group PC and counsel of record for Plaintiff in this action. I have personal knowledge of the facts set forth in this declaration, and if called to testify, I could and would testify competently and under oath to the same.

2. I am authorized to act on behalf of the copyright owner on matters involving the infringement of certain copyrighted works as detailed herein. This declaration is made in support of the accompanying proposed subpoena, pursuant to 17 U.S.C. § 512(h)(2)(C).

3. The purpose of the subpoena sought in this action is to obtain the identity of alleged copyright infringers, as described in the proposed subpoena. The information obtained will be used only for the purpose of protecting the rights granted to Christopher Boomer under Title 17 of the United States Code.

I declare under penalty of perjury the foregoing is true and correct.

Executed on February 20, 2024 in San Francisco, CA.

/s/ Sean K. Apple
Sean K. Apple